

UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF TENNESSEE  
NASHVILLE DIVISION



UNITED STATES OF AMERICA	)	
	)	
v.	)	Case No. 3:13-00100
	)	
REZA KOUSHKBAGHI	)	JUDGE TRAUGER

**JOINT MOTION TO TRANSFER CASE**

COMES NOW the United States, by and through Acting United States Attorney, David Rivera and Assistant United States Attorney, Blanche B. Cook, and Chuck Buckholts, Defense Attorney, and respectfully requests the above-captioned case be transferred to Chief Judge Haynes if he consents to hear the case.

As grounds for the requested transfer, the United States submits that this case is the identical case of *United States v. Reza Koushkbaghi, et al.*, Case No. 3:09-00218, an opium-related case involving fourteen defendants, including the instant defendant. To date, Chief Judge Haynes has heard motions, accepted plea agreements, and sentenced defendants.

In these circumstances, the United States believes it would serve the interests of justice, as well as the efficient administration of justice, to transfer the instant case to Chief Judge Haynes. Placing all related defendants before the same Court would reduce repetitive presentations of factual matters to the Court and ensure that the Court has full knowledge of the defendants' circumstances at the time of sentencing, including the effect, import, and extent of their cooperation.

For the foregoing reasons, the United States requests that the above-styled case be transferred to Chief Judge Haynes, if he so consents.

Respectfully submitted,